

FILED IN OPEN COURT ON 6/26/07

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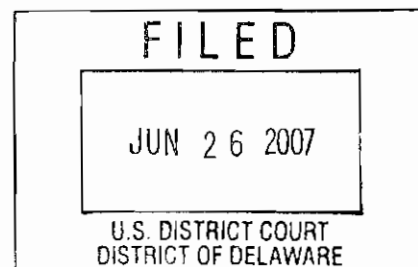
**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Criminal Action No. 06-79-GMS
)	
RITCHIE JACKSON,)	
)	
Defendant.)	

**MOTION FOR REVOCATION OF ORDER OF
PRE-TRIAL RELEASE AND DETENTION PENDING TRIAL**

NOW COMES the United States of America, by and through its attorneys, Colm F. Connolly, United States Attorney for the District of Delaware, and Beth Moskow-Schnoll, Assistant United States Attorney, and, pursuant to 18 U.S.C. § 3148(b), hereby moves for the revocation of the Court's order of pre-trial release of the defendant, and further moves for the pre-trial detention of the defendant, pursuant to Federal Rules of Criminal Procedure 32.1(a)(6) and 46(d).

In support of this motion, the United States alleges as follows: (a) there is clear and convincing evidence that the defendant has violated one or more conditions of his release; (b) based on the factors set forth in 18 U.S.C. § 3142(g), there is no condition or combination of conditions of release that will assure that the defendant will not flee; and (c) the defendant is

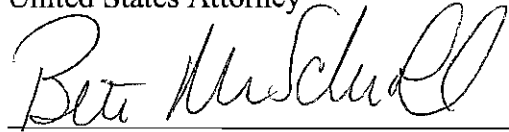


unlikely to abide by any condition or combination of conditions of release.

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

By:

A handwritten signature in black ink, appearing to read "Beth Moskow-Schnoll", written over a horizontal line.

Beth Moskow-Schnoll
Assistant United States Attorney

Dated: June 26, 2007